U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Chemical Recycling - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial
Chemical Recycling
06NH
Wylie, TX
Latitude: 33.0078590 Longitude: -96.5495480

To:
From: Eric Delgado, OSC
Date: 1/9/2016
Reporting Period: 16 December 2015 – 09 January 2016

1. Introduction

1.1 Background

Site Number:	06NH	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/20/2015
Response Authority:		**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	12/16/2015	**Start Date:**	12/15/2015
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Fund Lead Removal

1.1.2 Site Description

The site consists of an office and warehouse building located at the south end of the site. The main plant access road runs north-south to the east of the office and then splits east-west approximately 300 feet from the south boundary. Also visible on the property are two “experimental roads” that were reportedly constructed of stillbottoms and covered with gravel. One of these roads runs north-south from the east side of the production pad area, approximately 280 feet, to the “outer fence” boundary where it makes a “T.” The other road was constructed primarily as a fire barrier and it runs north-south almost the entire length of the property. A small, circular pond is located in the central portion of the site immediately east of the main access road.

1.1.2.1 Location

The Chemical Recycling Site is located at 900 W. Kirby in Wylie, Collin County, Texas. The site encompasses a total of 5 acres, approximately 3.5 of which are within the on-site fencing. The former plant area is fully fenced. There is another fence, designated as “outer fence” running east-west approximately 160 feet north of the “north fence” of the plant area. The geographic coordinates of the site are Latitude 33.00787o North and Longitude -96.54958o West.

1.1.2.2 Description of Threat

Based on historical and current Removal Site Evaluation (RSE) information, the primary concern at the Site is the presence of hazardous substances (lead) distributed on surficial soils on site and the potential migration of the hazardous substances (lead) to the surrounding properties and trespassers on site. The Site is abandoned and is accessible to the local population; evidence of trespassing is apparent because homeless people have sought shelter in the vacated office building. The predominant threat to human populations is the potential exposure to the contaminated soils by the most sensitive populations. Exposure to these hazardous substances (lead) could be from ingestion and inhalation. Lead is a hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. 9601(14) and further defined by 40 C.F.R. 302.4. There is a potential for exposure of human populations and animals to toxic concentrations of the hazardous substances listed before by ingestion or inhalation of surficial soils found in the soil within

the site boundary. The site is accessible to the public and the impact to the adjacent neighborhood/trespassers is likely. Currently there is a fence surrounding the facility, but entry into the facility is easily accessible.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

From June 02, 2014 to June 23, 2014 the U.S. Environmental Protection Agency Region 6 (EPA) performed a RSE at the Site. The objectives of the RSE were to determine if the Site presented a threat to public health or welfare of the United States or the environment in accordance with *40 Code of Federal Regulations (CFR) 300.415* as well as the extent of such contamination.

The objectives of the RSE were achieved by evaluating historical data collected by the Potentially Responsible Parties (PRPs) and analytical results obtained during the removal site evaluation. Removal assessment activities included collecting soil samples from on-site source areas and from off-site locations to determine the nature and extent of site-related contamination. A geophysical survey was conducted to determine if underground structures, piping, and/or buried drums were present on-site and to serve as a precaution to identify unknown subsurface objects prior to conducting the soil sampling activities. In addition, the RSE included a limited asbestos survey of the on-site office/warehouse to determine the presence of Asbestos Containing Building Material (ACBM). A total of 118 drums located in the office/warehouse were sampled for waste characteristics [Toxicity Characteristic Leaching Procedure (TCLP)] during the removal assessment.

All soil sample results were compared to EPA Non-carcinogenic Industrial Removal Management Levels (RMLs). The site cleanup levels are set for Lead at 800 mg/kg in soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The removal action involves the removal of contaminated soils up to two feet below ground surface found on site. Hazardous substances will be profiled, packaged, and transported to off-site disposal facilities that are in compliance with the EPA Offsite Rule. All waste streams will be profiled and disposed of appropriately. Contaminated soil will be excavated and backfilled. The property will be graded and stabilized.

During this reporting period, site preparations were completed to facilitate the proposed actions in the Action Memorandum. Heavy rain in the area during the week of January 4th (01/04-09) has impacted site operations.

2.1.2 Response Actions to Date

On 12/16/15, EPA START (3 members) mobilized to the site and met with EPA ERRS contractors (4 members) and an EPA OSC. EPA START deployed VIPER with four DataRAMs to monitor the air for particulates, while ERRS contractors cleared shrub with a heavy duty brush cutter. Vegetative debris and empty drums were stockpiled at the center of site for future disposal.

City of Wylie officials arrive on site to discuss the use of a private road running parallel to the west of the site. City of Wylie officials stated they would take responsibility for any damages caused on the private road and repair the private road to the original condition.

On 12/17/15, EPA START (1 member) arrives on site to establish excavation grids using a Geographic Positioning System device. A total of 32 grids were establish ranging in size of 40ft x 40ft, 60ft x 80ft, and 100ft x 100ft. ERRS crews continued to clear shrubs and brush on site, and collected a composite waste characterization sample of the 32 grids.

During the period of 1/05/16 to 1/08/16, ERRS contractors (7 members) installed 8ft x 16ft wooden loading pads with ¾ inch gravel laid on top near the southwestern corner of the property, designate the area as the Support Zone. The Support Zone consists of an 8ft x 20ft storage container, 10ft x 30ft Command Post, two generators, two portable restrooms with a hand washing station, and a parking zone for site personnel. Heavy equipment on site consists of a front shovel excavator, 9 yard dump track, and a skid steer loader. No excavation activities occurred due to an overnight 9 inch rain event on 1/05/16, site conditions improved by 1/08/16.

On 1/09/16, ERRS contractors began excavation activities on the north side of the site, grid R01 and B01, both grids were excavated to 6 inches below ground surface. Excavated soil is staged north of the Support Zone for anticipated transportation on 1/13/16. An estimated 100 cubic yards of contaminated soil has been excavated during this reporting period, excavation of B01 will continue on 1/11/2015. No air monitoring was deployed on site as soil conditions continue to be saturated from the previous rain event.

ERRS collected a composite waste characterization sample of the 32 grids. The composite sample passed TCLP, site was deemed as Class 2 Non-Hazardous Waste.

An estimated 100 yards^3 of contaminated soil from 1 ½ grids (R01 and half of B01) has been excavated and staged north of the Support Zone for transportation and disposal at a CERCLA approved disposal facility.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Site PRPs formed a steering committee, the Chemical Recycling Incorporated Steering Committee and has elected not to perform the Removal Action.

2.1.4 Progress Metrics

No disposal metrics to report at this time.

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

For the week ending on 1/16/16, an estimated 330 yard^3 will be excavated from 8 grids. Transportation of waste to a CERCLA approved disposal facility is also scheduled for the next reporting period.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

Front shovel excavator (1)

Dump track - 9 yards (1)

Compact track loader (1)

Command Post

Generators (2)

Storage Container (2)

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

EPA On Scene Coordinator (1)

START Contractor (1)

ERRS Contractor (7)

5. Definition of Terms

OSC - On Scene Coordinator

ERRS - Emergency and Rapid Response Services

START - Superfund Technical Assistance Response Team

TCLP - Toxicity Characteristic Leaching Procedure

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

POLREPS will be issued weekly

7. Situational Reference Materials

No information available at this time.